

**Region 9 Enforcement and Compliance Assurance Division**  
**INSPECTION REPORT**

<b>Inspection Date(s):</b>	August 17, 2021		<b>Inspection Announced:</b> No
	<b>Entry:</b> approximately 8:20 a.m.		<b>Exit:</b> approximately 1:45 p.m.
<b>Media:</b>	Hazardous Waste		
<b>Regulatory Program(s)</b>	Resource Conservation and Recovery Act (RCRA), Subtitle C		
<b>Facility Name:</b>	Americas Styrenics, LLC		
<b>Site Name:</b>	Americas Styrenics, LLC (AmSty)		
<b>Facility/Site Physical Location:</b>	305 Crenshaw Boulevard		
<b>(city, state, zip code)</b>	Torrance, CA 90503-1791		
<b>Geographic Coordinates:</b>	Latitude: 33.84641, Longitude: -118.32878		
<b>Mailing address:</b>	305 Crenshaw Boulevard		
<b>(city, state, zip code)</b>	Torrance, CA 90503-1791		
<b>County:</b>	Los Angeles County		
<b>Facility/Site Contact:</b>	Chuong Nhan	Specialist-Environmental	
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	424-488-3735		
<b>Facility/Site Identifier:</b>	CAR000193433		
<b>Media Number:</b>	FRS #: 110000475138		
<b>NAICS:</b>	32614, 326199, 424610, 325211		
<b>Facility/Site Personnel Participating in Inspection:</b>			
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## SECTION I – INTRODUCTION

On August 17, 2021, a representative of the U. S. Environmental Protection Agency (EPA) and a representative of the Los Angeles County, Fire Department, Health Hazardous Materials Division (LACFD-HMMD), conducted an unannounced compliance evaluation inspection (CEI) of the Americas Styrenics, LLC (AmSty or Facility) facility located in Torrance, California. The purpose of the inspection was to evaluate AmSty's compliance with applicable federal environmental statutes and regulations, in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, the California Health and Safety Code (HSC), Division 20, Chapter 6.5; and the California Code of Regulations (CCR), Title 22, Division 4.5.<sup>1</sup>

### Opening Conference

Inspector Schofield presented his credentials to Specialist Nhan and Plant Manager Bedoya and informed the representatives that this was an EPA inspection to determine AmSty's compliance with the RCRA regulations listed above. As part of the opening conference, Inspector Schofield informed the AmSty representative of the facility's rights to claim certain information and documentation obtained during the inspection as confidential business information. Inspector Schofield further explained that the focus of the inspection would be compliance with applicable RCRA air emission regulations to any AmSty equipment (e.g., flanges, pumps) that comes into contact with organic waste at a concentration equal to or greater than 10% by weight and any AmSty hazardous waste containers and tanks used to accumulate waste with a volatile organic content equal to or greater than 500 parts per million (ppm) by weight (22 CCR §§ 66262.34(a)(1)(A); 66265 Article 28; 66265 Article 28.5 [40 CFR §§ 262.17(a)(1)(i); 265 Subpart BB; 265 Subpart CC]). Inspector Schofield also informed the AmSty representatives that the CEI would consist of an on-site inspection of satellite accumulation areas, central accumulation area(s)<sup>2</sup>, hazardous waste tanks, piping and equipment used to transfer volatile/organic hazardous waste to hazardous waste accumulation containers and tanks, if any, taking photographs and a records review.

Note: David Thomas, Corporate Environmental Manager, participated in portions of the CEI via telephone conversations during the CEI.

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<sup>1</sup> All citations in this report refer to the California Code of Regulations (CCR) refer to Division 4.5 of Title 22 of the current California Code of Regulations. EPA is enforcing California hazardous waste management program requirements as approved and authorized by the United States on August 1, 1992 (see 57 Fed. Reg. 32726, July 23, 1992), September 26, 2001 (66 Fed. Reg. 49118, September 26, 2001), October 7, 2011 (see 76 Fed. Reg. 62303, October 7, 2011), January 14, 2020 (see 85 Fed. Reg. 2038, January 14, 2020) and June 1, 2021 (see 86 Fed. Reg. 29207). Corresponding Federal citations are provided as a convenience in brackets.

<sup>2</sup> As of May 30, 2017, EPA refers to less than 90-day hazardous waste accumulation areas (Large Quantity Generators) and less than 180-day hazardous waste accumulation areas (Small Quantity Generators) as Central Accumulation Areas (reference 81 *FR* 85732 and 81 *FR* 85743).

## Compliance History

### *Los Angeles County, Fire Department, Health Hazardous Materials Division*

The California Environmental Protection Agency (CalEPA), under the Unified Program overseen by CalEPA, has certified LACFD-HMMD as a Certified Unified Program Agency (CUPA) to perform hazardous waste generator inspections and enforcement actions, and tiered permitting for certain waste treatment activities that do not require a RCRA permit.<sup>3</sup>

According to the EPA's RCRAInfo database, LACFD-HMMD has performed four (4) inspections of AmSty: December 4, 2015 (no violations), January 26, 2016 (no violations), April 19, 2016 (no violations), and April 24, 2019 (2 unspecified violations).

The California Environmental Reporting System (CERS) database used by CUPA to document their inspections corresponds with the information found in RCRAInfo. However, the April 24, 2019 violations were detailed in the CERS database: 1. Waste styrene and water accumulating in secondary containment pallets and 2. hazardous waste accumulation tanks not marked and labeled, as required.

### *California Department of Toxic Substances Control (DTSC)*

According to the EPA RCRAInfo database, DTSC has never inspected AmSty. Note: Hazardous waste generator inspections are mostly performed by the area CUPA.

### *U. S. Environmental Protection Agency, Region 9*

Prior to the August 17, 2021 CEI, EPA had never performed a CEI of the AmSty facility.

## Facility/Site Description

AmSty produces polystyrene products from styrene that is transported to the Facility by rail. The polystyrene products produced are general purpose polystyrene and high-impact polystyrene. The high impact polystyrene is used in packaging and in the manufacturing of home appliances.

Styrene shipped to the facility via rail is unloaded into product storage tanks. From the storage tanks the styrene is transferred by overhead piping to one of two reactor trains where the styrene is converted to polystyrene products. From the information provided by AmSty staff, the polystyrene production process is performed in batches.

A partial condenser and condenser are associated with each reactor train. The condenser system is used to recycle back some of the material back into the process. High boiling point materials are collected in the vessels associated with the reactor train. From the vessels (T469 and T569), the collected material (D001, D018) is piped to hazardous waste accumulation tank, T307.

The facility has air pollution control permits issued by the South Coast Air Quality Management District (Facility Identification Number: 156049). According to at least one of the air pollution control permits reviewed, the facility is required to develop and implement a Leak Detection and

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<sup>3</sup> LACFD-HMMD is certified to inspect and enforce regulations for five other programs (e.g., underground storage tanks).

Repair (LDAR) program (see Rule 1173, 40 CFR Part 60, Subpart BB). The LDAR program developed by AmSty includes tagging of regulated equipment and quarterly monitoring of the regulated equipment. The monitoring is performed by an AmSty contractor. According to AmSty staff, there are no unsafe to monitor equipment located at the Facility. There is equipment identified by the Facility as inaccessible. Inaccessible equipment is monitored in the third quarter of each calendar year.

Other operations at the Facility include, QA/QC laboratory, maintenance, equipment and product storage, and administrative activities.

As a result of manufacturing polystyrene, AmSty generates non-RCRA and RCRA wastes. Most of the hazardous waste generated by the Facility is accumulated in two (2) aboveground tanks, T307 and T599.

The following table lists the RCRA regulated wastes shipped off-site from January 1, 2021 to July 16, 2021:<sup>4</sup>

<b>Waste Description</b>	<b>Waste Code</b>	<b>Tons</b>
Ignitable	D001	665.49
Benzene	D018	675.50
Non-halogenated solvents	F003	12.4
Non-halogenated solvents	F005	12.4

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<sup>4</sup> Data obtained from the California Hazardous Waste Tracking System.

## SECTION II – OBSERVATIONS

The following areas of the AmSty facility were inspected: facility maintenance area, central accumulation area (CAA), universal waste accumulation area, rail off-loading area, the equipment and product storage areas, on-site laboratory, and production areas.

As part of the RCRA air emissions portion of the inspection, Inspector Schofield traced hazardous waste transfer lines inspecting to see if regulated equipment was marked/tagged and observe if any of the regulated equipment had any visible leaks.

The following table summarizes the findings and observations of EPA’s on-site inspection and records review:

	Regulatory Citation	Findings/Observations	Evidence, References and/or Corrective Action
1	<p><b>Open hazardous waste satellite accumulation containers at the Facility were observed.</b></p> <p>22 CCR §§ 66262.34(e)(1)(D); 66265.173(a) [40 CFR § 262.15(a)(4)]</p> <p><i>A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste.</i></p>	<ol style="list-style-type: none"> <li>1. An open, labeled 55-gallon plastic container of D001, D018 waste was observed in a flammable cabinet. No AmSty personnel were observed adding or removing waste from the open container.</li> <li>2. Ring to an open, labeled 55-gallon metal container of D018 waste was not secured. No AmSty personnel were observed adding or removing waste from the open container.</li> <li>3. Funnel to a labeled, 55-gallon metal container of D018 hazardous wastes was not secured. The funnel also did not have a gasket seal. No AmSty personnel were observed adding or removing waste from the open container.</li> </ol>	<ol style="list-style-type: none"> <li>1. Photographs: IMG_0022.JPG and IMG_0023.JPG.</li> <li>2. Photographs: IMG_0026.JPG and IMG_0027.JPG.</li> <li>3. Photographs: IMG_0042.JPG, IMG_0043.JPG, and IMG_0044.JPG.</li> </ol>

### **SECTION III – AREAS OF CONCERN**

- As part of tracing the hazardous waste transfer lines, Inspector Schofield observed areas where leaks had occurred (Photographs IMG\_0001.JPG, IMG\_0010.JPG, IMG\_0011.JPG, and IMG\_0014.JPG). None of the leaks were observed on any of the equipment that was marked/tagged.
- Secondary containment pallets in the CAA were observed with accumulated liquids (Photographs: IMG\_0040.JPG and IMG\_0041.JPG). Allowing liquids to accumulate in secondary containment pallets will reduce the capacity of the secondary containment pallet to contain a leak and will cause the secondary containment pallet to be managed as a hazardous waste accumulation container.

### **SECTION IV – RECORDS REVIEW**

The inspectors reviewed the following records provided by AmSty:

- 2019 biennial report (as submitted and obtained from RCRAInfo);
- Hazardous waste manifests and land disposal restrictions, last 3 years (on-site and as obtained from EPA e-Manifest database);
- Training records, and
- Contingency plan.

### **SECTION V – CLOSING CONFERENCE**

After completing the facility inspection and records review, a closing conference was held with Specialist Nhan, Plant Manager Bedoya and Corporate Environmental Manager Thomas. The LACFD-HMMD inspector did not participate in the Closing Conference. The items listed in Sections II and III of this report were reviewed. Inspector Schofield informed Facility staff that he would be requesting LDAR monitoring data, a copy of the unsafe to monitor plan, and information related to vessels T469 and T569.

### **SECTION VI – POST-INSPECTION**

On August 20, 2021, Inspector Schofield sent an e-mail to AmSty requesting the following information:

- Please provide Leak Detection and Repair (LDAR) reports prepared by AmSty's consultant in 2020 and 2021 to date;
- Please provide a list of Unsafe to Monitor equipment that has been identified by AmSty and/or its consultants (see 22 CCR 66265.1057(f)(1)) in effect at the time of the inspection;
- Please provide Unsafe to Monitor Plan (22 CCR 66265.1057(f)(2)) in effect at the time of the inspection.
- Please provide a complete list of equipment covered under the facility's LDAR program. Please confirm my understanding the tanks T-469 and T-569 receive materials from the partial condensers. From these tanks the waste materials are transferred to hazardous

waste accumulation tanks T-307 and/or T-559. Additionally, what is the average length of time materials are held in Tanks T-469 and T-569 before being transferred to the hazardous waste accumulation tanks? Finally, please confirm that none of materials collected in T-307 and/or T-559 are recycled or reclaimed.

- There were repair tags for PV-3302 and for either monitoring point 10603 or 10608. The repair tag for PV-3302 was not legible. The date of the other tag was 4-1-2020. Please provide inspection and repair records related to these two items identified for repair.

The requested documents and information were provided by AmSty to EPA on September 2, 2021. However, EPA's internet security system removed the attachment documents. On October 20, 2021, AmSty, through EPA's online file transfer service, provided the requested documents.

## **SECTION VII – LIST OF ATTACHMENTS**

Attachment 1: Photograph Contact Sheet.